

THE LAW OFFICES OF ANDREW J. FRISCH, PLLC

October 3, 2024

The Honorable Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

*Re: United States v. Carlos Watson and OZY Media, Inc.;
Criminal Docket No. 23-0082 (EK)*

Dear Judge Komitee:

Simultaneously with the filing of this letter, I am filing a notice of appearance on behalf of Carlos Watson and OZY Media, Inc. in the above-referenced case. I respectfully submit this letter in support of my application that (1) my notice of appearance be accepted so that I may represent Mr. Watson and OZY going forward; (2) the deadline for submission of a reply in further support of Mr. Watson's pending renewed motion for a judgment of acquittal or a new trial [Docket No. 314] be extended (the government's response is due October 7, 2024); and (3) the new date for sentencing set yesterday, December 13, 2024, be extended to late January to accommodate new counsel's entry in the case.

Mr. Watson and I began speaking a few weeks ago about my representing him in this case going forward. During that time, I began educating myself about aspects of the case. When it became clear this past Monday that Mr. Watson would engage my services, I drafted the first iteration of this letter with the intent of filing it by tomorrow. Yesterday, I became aware of the Court's conference call with the parties and have modified this letter accordingly.

I appreciate that the Court and the government have an interest in moving forward with the pending motion and sentencing. I believe that Mr. Watson has been diligently attempting to identify and engage new counsel. Now that new counsel is formally engaged, I need sufficient time to review the trial record and history of the case so that I may effectively (1) reply in further support of the pending renewed motion for acquittal or a new trial; (2) assist with the defendants' submissions to and interviews with the Probation Officer preparing the presentence report; (3) address and brief any objections thereto in a case which may raise significant issues under the Sentencing Guidelines; (4) prepare a memorandum in aid of sentencing; (5) address the Court's sentencing-related questions in its Order of September 13, 2024 [Docket No. 313]; and (4) otherwise advocate for Mr. Watson and OZY - all while providing the government ample time to be heard. Upon considering these tasks in the context of

my other commitments as a solo practitioner, I realistically believe that I would need until at least late January 2025 to effectively represent my new clients and also prepare work product that would aid the Court.

If my notice of appearance is accepted, I will work with my new clients to assure that their disclosure forms are submitted to the Probation Department within the next ten days and will immediately contact the assigned officer to schedule the interview within the next two weeks.

I very much appreciate the Court's consideration.

Respectfully,

/s/ Andrew J. Frisch
Andrew J. Frisch

cc: Counsel of Record